

# Exhibit D

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat  
Brown

**DECLARATION OF RACHEL HARADA**

I, Rachel Harada, under oath, declare as follows:

1. I am a current student-athlete at Rockhurst University located in Kansas City, Missouri. I am a senior and a member of the women's soccer team. I am not related to any of the lawyers currently representing the parties in this matter. I have not been promised any compensation for my participation in this matter. I have full knowledge of the matters stated herein and could and would testify hereto if necessary.

2. I received and reviewed the Amended Settlement Agreement in this matter. I was asked to review the Settlement Agreement on behalf of current NCAA student-athletes to determine if the Settlement is fair, adequate and reasonable.

3. The Settlement is a major step in the right direction to address concussions in NCAA sports. Concussions are unfortunately common in soccer and can result from contact with other players, the ground, and heading the ball.

4. In my opinion, the most important aspect of the Settlement is the requirement that student-athletes, coaches, and trainers receive concussion management education. It is important

that student-athletes, coaches, and trainers be able to recognize a concussion and when a student-athlete should be removed from play to avoid further injury.

5. It is also important that the Settlement requires that doctors be present at each game and practice for contact sports to ensure that student-athletes do not attempt to continue to play while experiencing symptoms.

6. In addition, the requirement that all schools conduct mandatory baseline testing is very important. While having trainers and doctors present at games and practices is extremely helpful, baseline testing provides an objective measurement to determine when it is appropriate for a student-athlete to return to play.

7. I may have sustained a concussion that went undetected and have also witnessed my teammates sustain concussions, including a former teammate forced to retire from soccer due to cumulative concussions. Therefore, I am grateful that all current and former student athletes – including myself and my teammates – will have access to the Medical Monitoring Program.

8. From my personal experience, I know how serious concussions can be. Therefore, I want to be a part of the case to ensure that student athletes obtain the benefits of this Settlement.

Date: March 31, 2015

Rachel Harada

